

February 18, 2016

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

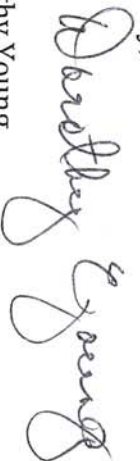
RE: EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of Valliant Telephone Company – Long Distance (499 Filer ID #803154), please find the attached annual CPNI certification and accompanying statement for 2016 (covering 2015) which is being filed pursuant to 47 C.F.R. §64.2009(e).

Should you have any questions or need further information, please contact me at (512) 652-7726.

Sincerely,



Dorothy Young  
Authorized Representative of  
Valliant Telephone Company

DY/pjf

Attachment

cc: Mr. Tommy Dorries, Valliant Telephone Company  
Ms. Debbie Dorries, Valliant Telephone Company

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2016 covering the prior calendar year 2015

Date filed: February 18, 2016

Name of company covered by this certification: Valliant Telephone Company –  
Long Distance

Form 499 Filer ID: 803154

Name of signatory: Debbie Dorries

Title of signatory: Secretary

I, Debbie Dorries, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The Company is not aware of any attempts by pretexters to access the CPNI of the Company's customers and has not had to take any actions against data brokers.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed Debbie Dorries

Attachment: Accompanying Statement explaining CPNI procedures

## **ACCOMPANYING STATEMENT**

To the best of my knowledge, Valliant Telephone Company – Long Distance (“the Company”) is in full compliance with the FCC’s rules on CPNI and its requirements for the safeguarding of such customer information. The Company’s operating procedures ensure that it is in compliance with the FCC’s CPNI rules because disclosure of, or permitting access to, our customers’ CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations, 47 C.F.R §64.2001 through §64.2011.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F.R. §64.2010, including, but not limited to the following: Customers are properly authenticated before disclosing CPNI on customer-initiated telephone calls, business office visits, or online access to customer accounts. Authentication through the use of passwords and back-up authentication questions in the event of lost or forgotten passwords has been implemented. Passwords and back-up authentication questions are established in accordance with §64.2010(e). Customers are authenticated in compliance with §64.2010(c) prior to online access to customer account information. The Company has implemented procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

The Company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC’s rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. In accordance with Company policy, any employee that uses, discloses, or accesses CPNI in violation of federal regulations is subject to disciplinary action, and possible termination.

The Company requires express opt-in consent from a customer prior to the release of CPNI to a joint venture partner or independent contractor for marketing purposes. However, currently the Company has no joint venture partner and does not release CPNI to any third parties for marketing purposes.

The Company has assigned a Director for CPNI Compliance to serve as the central point of contact regarding the Company’s CPNI responsibilities and questions related to CPNI policy. The Director for CPNI Compliance has responsibilities including, but not limited to, supervising the training of all Company employees with access to CPNI, investigating complaints of unauthorized release of CPNI, and reporting any breaches to the appropriate law enforcement agencies. The Director for CPNI Compliance also maintains records in accordance with FCC CPNI rules,

Valliant Telephone Company – Long Distance  
2016 CPNI Certification covering 2015

including records of any discovered breaches, notifications of breaches to law enforcement, and law enforcement's responses to the notifications for a period of at least two years.